

KING & SPALDING

King & Spalding LLP  
1185 Avenue of the Americas, 34th Floor  
New York, NY 10036-4003  
Tel: +1 212 556 2100  
Fax: +1 212 556 2222  
www.kslaw.com

Andrew C. Hruska  
Partner  
Direct Dial: +1 212 556 2278  
Direct Fax: +1 212 556 2222  
ahruska@kslaw.com

June 10, 2024

**VIA ECF**

Hon. Lawrence E. Kahn  
U.S. District Court for the Northern District of New York  
James T. Foley U.S. Courthouse  
445 Broadway, Room 424  
Albany, NY 12207-2926

Re: *Young America's Foundation et al v. Stenger et al*, 3:20-cv-822-LEK-TWD

Dear Judge Kahn:

Pursuant to Local Rule 7.1(b)(1), and for purposes of efficiency, Plaintiffs respectfully request leave of the Court to file a single, omnibus memorandum of law not to exceed 50 pages – rather than four separate legal memoranda of 25 pages each – in response to the Defendants' four separate motions for summary judgment (*see* Dkt. Nos. 307, 308, 311, 313). Plaintiffs conferred with counsel for each of the Defendants, and all consented to this relief.

If Plaintiffs' request is granted, Plaintiffs will file four separate Responses to Statements of Material Fact filed by the Defendants, as contemplated by Local Rule 56.1(b), and a single omnibus Statement of Additional Material Facts in Dispute.

Respectfully Submitted,

/s/ Andrew C. Hruska  
ANDREW C. HRUSKA  
KING & SPALDING LLP  
1185 Avenue of the Americas  
New York, NY 10036  
(212) 556-2100  
ahruska@kslaw.com